K&L GATES LLP Robert N. Michaelson, Esq. 599 Lexington Avenue New York, NY 10022 (212) 536-3900 Adjourned Hearing Date: December 16, 2009 at 10:00 a.m. (EST) Adjourned Objection Deadline: December 11, 2009 at 4:00 p.m. (EST)

-and-

Marc L. Barreca 925 Fourth Avenue Suite 2900 Seattle, Washington 98104 (206) 623-7580

Attorneys for Seattle Pacific University

UNITED STATES BANKRUPTCY COURT

NOTICE OF ADJOURNMENT OF HEARING WITH RESPECT TO MOTION OF SEATTLE PACIFIC UNIVERSITY FOR AN ORDER COMPELLING LEHMAN BROTHERS SPECIAL FINANCING INC. TO ASSUME OR REJECT EXECUTORY CONTRACTS PURSUANT TO 11 U.S.C. § 365(d)(2)

PLEASE TAKE NOTICE that the hearing (the "Adjourned Hearing") on Seattle Pacific University's Motion for an Order Compelling Lehman Brothers Special Financing Inc. to Assume or Reject Executory Contracts Pursuant to 11 U.S.C. §365(d)(2) (the "Motion") (Docket No. 5672) has been adjourned to **December 16, 2009 at 10:00 a.m.** (prevailing Eastern time) or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that the Adjourned Hearing to consider the relief requested in the Motion will be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004 (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the Motion must be: (a) in writing; (b) state the name of the objecting party; (c) state with particularity the reasons for such objection; (d) be filed with the Clerk of the Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, with a courtesy copy to the Chambers of the Honorable James M. Peck; and (e) served upon: (i) K&L Gates LLP, 599 Lexington Avenue, New York, New York 10022 (Attn: Robert N. Michaelson, Esq. and Eunice Rim, Esq.), the undersigned counsel for the Movant, (ii) Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai W. Waisman, Esq. and Jacqueline Marcus, Esq.), attorneys for the Debtors, (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Andy Velez-Rivera, Paul Schwartzberg, Brian Masumoto, Linda Riffkin and Tracy Hope Davis) and (iv) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq. and Evan Fleck, Esq.), attorneys for the official committee of unsecured creditors, so as to be received no later than **December 11, 2009 at 4:00 p.m**. (prevailing Eastern time) (the "Adjourned Objection Deadline").

**PLEASE TAKE FURTHER NOTICE** that, objections, if any, to the Motion must be filed: (a) through the Bankruptcy Court's electronic filing system; or (b) if an objecting party is unable to file an objection electronically, such party must submit the objection in PDF format in

an envelope with (i) the case name, (ii) the case number, (iii) type and title of document, (iv) document number of the document to which the objection refers and (iv) the file name, on the outside of the envelope; or (c) if an objecting party is unable to electronically file its objection or provide the objection in PDF format, such party shall submit such objection on a diskette in Microsoft Word or any other Windows-based word processing format to the Clerk of the Bankruptcy Court with a label containing the information indicated in section (b) of this paragraph.

**PLEASE TAKE FURTHER NOTICE** that, if no objections to the Motion are timely filed by the Adjourned Objection Deadline, the Court may grant the relief requested in the Motion without a hearing.

Dated: New York, New York November 13, 2009 Respectfully submitted,

**K&L GATES LLP** 

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